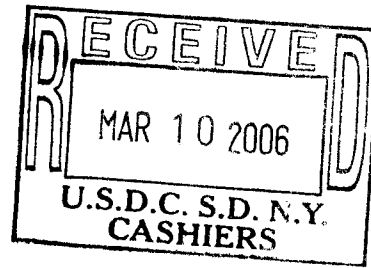


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Judge Pauley

WANDA TECHNOLOGY, INC.,

Plaintiff,

vs.

CHINA SHIPPING CONTAINER LINES
CO., LTD., EAST-WEST LOGISTICS CO.,
INC., BURLINGTON NORTHERN SANTA
FE CORP., and BNSF RAILWAY CORP.,

Defendants.

06 CV 1913

DOCKET NO.:

COMPLAINT

Plaintiff, Wanda Technology, Inc. through its attorneys, Hill Rivkins & Hayden LLP,
complaining of the above named defendants alleges upon information and belief as follows:

FIRST: This court has jurisdiction pursuant to 28 U.S.C. 1333 in that this is an admiralty
and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure.

SECOND: At and during all the times hereinafter mentioned, plaintiff had and now has the
legal status and principal office and place of business stated in Schedule A hereto annexed and
by this reference made a part hereof.

THIRD: At and during all times hereinafter stated, defendants had and now have the status and offices and places of business stated in Schedule A, and now are engaged in business as common carriers of merchandise by water and/or land for hire, and additionally conducted business within the boundaries of the Southern District of New York State.

FOURTH: On or about the date and at the port of shipment stated in Schedule A, there was delivered to the defendants and/or their agents in good order and condition the cargoes described in Schedule A, which the defendants received, accepted and agreed to transport for certain consideration to the port of destination stated in Schedule A.

FIFTH: Thereafter, the cargoes were not delivered and/or delivered short and/or otherwise damaged.

SIXTH: By reason of the premises, the above named defendants, breached, failed and violated their duties and obligations as common carriers, were negligent, and are otherwise at fault.

SEVENTH: By reason of the premises, the above named defendants breached, failed, and violated their contractual duties and obligations to plaintiff.

EIGHTH: Plaintiff was the shipper, consignee, importer, and/or owner of the shipment as described in Schedule A, and brings this action on its own behalf and as agent and trustee, on

behalf of and for the interests of all parties who may be or become interested in the said shipment, as their respective interests may ultimately appear, and plaintiff is entitled to maintain this action.

NINTH: Plaintiff has performed all duties and obligations on its part to be performed.

TENTH: By reason of the premises, plaintiff has sustained damages as nearly as same can now be estimated, no part of which has been paid, although duly demanded, in the amount of \$16,093.10.

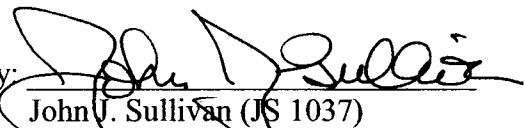
WHEREFORE, plaintiff prays:

1. That process in due form of law according to the practice of this Court may issue against the defendants.
2. That if the defendants cannot be found within this District, that all of their respective property within this District be attached in the sum set forth in this complaint, with interest and costs.
3. That a decree be entered in favor of plaintiff against defendants for the amount of plaintiff's damages, together with interests and costs.

4. Plaintiff further prays for such other, further and different relief as to this Court may seem just and proper in the premises.

Dated: March 10, 2006
New York, New York

HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiffs

By: 
John J. Sullivan (JS 1037)
Christopher M. Panagos
45 Broadway, Suite 1500
New York, New York 10006
(212)-669-0600

SCHEDULE A

Plaintiff's legal status and place of business:

Wanda Technology, Inc. is a corporation organized under the laws of one of the states of the United States with a principal place of business at 300 Croddy Way, Santa Ana, CA 92704.

Defendants' legal statuses and places of business:

China Shipping Container Lines Co., Ltd. is a corporation or other business entity with offices and a place of business at 100 Plaza Drive, Secaucus, NJ 07074.

East-West Logistics Co., Inc. is a corporation or other business entity with offices and a places of business at 182-30 150th Street, Room 123, Jamaica, NY 11413 and 14821 Northam Street, La Mirada, CA 90638.

Burlington Northern Santa Fe Corp. is a corporation or other business entity with offices and a place of business at 2650 Lou Menk Drive 2nd floor, Fort Worth, TX 76131-2830.

BNSF Railway Corp. is a corporation or other business entity with offices and a place of business at 2650 Lou Menk Drive 2nd floor, Fort Worth, TX 76131-2830.

Date of Shipment: 15 January 2005

Bill of Lading No.(s): EWL-022956
CHNJDLNYC3G0275

Container No.: CCLU2847758

Port of Loading: Dalian, China

Port of Discharge: New York (intended)

Shipper: Sichuan Arts and Crafts Import and Export Corporation

Consignee: Fortunoff, Inc.

Notify/Importer: Wanda Technology, Inc.

Description of Shipment: 230 pieces of cast iron bases (patio furniture)

Nature of Loss or Damage: non-delivery/alleged destruction while in transit involving railcar accident